

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALTON REAL ESTATE, INC.; EAST PEORIA REAL ESTATE, INC.; JOLIET REAL ESTATE HOLDING CO.; MOLINE REAL ESTATE, INC.; PEORIA REAL ESTATE, INC.; SCHUETZ ROAD REAL ESTATE, INC.; WOOD RIVER REAL ESTATE HOLDING CO.; EDWARDSVILLE REAL ESTATE, LLC; ELGIN REAL ESTATE, LLC; INVERNESS REAL ESTATE, LLC; NORTHBROOK REAL ESTATE, LLC; ROCKFORD REAL ESTATE, LLC; ST. CHARLES REAL ESTATE, LLC; CR FINANCE II, LLC; BRAVO CARE OF ALTON, INC.; BRAVO CARE OF EAST PEORIA, INC.; BRAVO CARE OF EDWARDSVILLE, INC.; BRAVO CARE OF ELGIN, INC.; BRAVO CARE OF INVERNESS, INC.; BRAVO CARE OF JOLIET, INC.; BRAVO CARE OF MOLINE, INC.; BRAVO CARE OF NORTHBROOK, INC.; BRAVO CARE OF PEORIA, INC.; BRAVO CARE OF ROCKFORD, INC.; BRAVO CARE OF ST. CHARLES, INC.; BRAVO CARE OF ST. LOUIS, INC.; BRAVO CARE OF WOOD RIVER, INC.; and MIDWEST ADMINISTRATIVE SERVICES, INC.,

Defendants.

Civil No. 18 C 5625

District Judge: Hon. John J. Tharp, Jr.

Magistrate Judge: Hon. Mary M. Rowland

**EMERGENCY MOTION FOR APPOINTMENT OF RECEIVER**

Pursuant to 28 U.S.C. § 754, Fed. R. Civ. P. 66, and L.R. 66.1, the United States hereby files this Emergency Motion for Appointment of Receiver, seeking the immediate appointment of Long Hill at Rosewood LLC as receiver to manage and operate the following 13 healthcare facilities known as the “Rosewood Facilities”:

Facility name	Location
Rosewood Care Center of Alton	Alton, Illinois
Rosewood Care Center of East Peoria	East Peoria, Illinois
Rosewood Care Center of Edwardsville	Edwardsville, Illinois
Rosewood Care Center of Elgin	Elgin, Illinois
Rosewood Care Center of Inverness	Inverness, Illinois
Rosewood Care Center of Joliet	Joliet, Illinois
Rosewood Care Center of Moline	Moline, Illinois
Rosewood Care Center of Northbrook	Northbrook, Illinois
Rosewood Care Center of Peoria	Peoria, Illinois
Rosewood Care Center of Rockford	Rockford, Illinois
Rosewood Care Center of St. Charles	St. Charles, Illinois
Foxes Grove Supportive Living Community	Wood River, Illinois
Rosewood Care Center of St. Louis.	St. Louis, Missouri

For the reasons set forth in the attached Memorandum of Law, the Court should grant the United States’ Emergency Motion to Appoint a Receiver.

Dated: August 20, 2018

Respectfully Submitted,

CHAD A. READLER  
Principal Deputy Assistant Attorney General

JOHN R. LAUSCH, JR.  
United States Attorney

/s/Shane Huang

RUTH A. HARVEY  
KIRK T. MANHARDT  
J. TAYLOR McCONKIE  
SHANE HUANG  
ARDC No. 6317316  
United States Department of Justice  
1100 L Street, N.W., No. 7030  
Washington, D.C., 20005  
(202) 307-0244  
shane.huang@usdoj.gov

Attorneys for the United States